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ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/19/2023

86 Chambers Street
New York, New York 10007

May 18, 2023

By ECF

The Honorable Analisa Torres
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *International Refugee Assistance Project, Inc. v. United States Citizenship and Immigration Services*, 23 Civ. 2931 (AT)

Dear Judge Torres:

This Office represents United States Citizenship and Immigration Services (the “Government”), defendant in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). This Office was served with the Complaint on April 24, 2023. The current deadline for the Government’s response is therefore May 24, 2023. The parties also have a deadline to submit a joint letter and a jointly proposed Case Management Plan and Scheduling Order on June 12, 2023.

With Plaintiff’s consent, we write respectfully to request a 45-day extension of time to file the Government’s response to the Complaint and a corresponding 45-day extension of time to submit a joint letter and a jointly proposed Case Management Plan and Scheduling Order. If the Court were to grant these requests, the Government’s response to the Complaint would be due on July 10, 2023 and the parties’ joint letter and jointly proposed Case Management Plan and Scheduling Order would be due on July 27, 2023. The reasons for these requests are twofold. First, the Government is actively conducting searches to identify potentially responsive documents and requires more time to complete this process and review any potentially responsive documents. Second, the parties are in the process of discussing the scope of Plaintiff’s claims, including whether Plaintiff will pursue a putative “policy and practice” claim. Additional time will enable the parties to clarify that issue, which in turn will help the Government decide how to respond to the Complaint. These are the Government’s first requests for extensions of these deadlines.

We thank the Court for its consideration of these requests.

Respectfully,

DAMIAN WILLIAMS

GRANTED.

SO ORDERED.

Dated: May 19, 2023
New York, New York


ANALISA TORRES
United States District Judge